

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

DEBORAH CHIN, on behalf of Herself and All  
Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., et al.,

Defendants

**No. 04-10294 DPW**

-----X  
DANIEL WILLIAMS,

Plaintiff,

v.

HASSAN AHMED, et al.

Defendants

**No. 04-10359 DPW**

-and-

SONUS NETWORKS, INC., A Delaware  
Corporation,

Nominal Defendant.

-----X  
MICHELLE P. BURK,

Plaintiff

v.

HASSAN AHMED, et al.

Defendants

**No. 04-10384 DPW**

-and-

SONUS NETWORKS, INC., A Delaware  
Corporation,  
Nominal Defendant.

MICHAEL PISNOY,

Plaintiff

v.

HASSAN AHMED, et al.

Defendants

-and-

SONUS NETWORKS, INC., A Delaware  
Corporation,

Nominal Defendant.

No. 04-10576 DPW

**PLAINTIFF MICHELLE BURK'S MOTION TO CONSOLIDATE  
DERIVATIVE CASES AND TO APPOINT CO-LEAD COUNSEL**

Plaintiff Michelle Burk, plaintiff in the above-captioned shareholder derivative action, Burk v. Ahmed et al, Case No. 04-cv-10384 (DPW), hereby respectfully moves this Court to enter an Order (in the form of proposed Pretrial Order No. 1 submitted herewith), which (a) consolidates three substantially similar shareholder derivative actions currently pending before this Court; (b) appoints the law firms of Wolf Haldenstein Adler Freeman & Herz LLP and Schubert and Reed LLP as co-lead counsel for the derivative plaintiffs; (c) appoints the law firm of Gilman and Pastor LLP as liaison counsel for the derivative plaintiffs; and (d) establishes procedures for consolidating other later-filed derivative cases herein and related case management matters.

The three related derivative cases to be consolidated are styled as follows:

<u>Case Name</u>	<u>Case Number</u>	<u>Date Filed</u>
Williams v. Ahmed, et al.	04-cv-10359 (DPW)	2-23-04
Burk v. Ahmed, et al.	04-cv-10384 (DPW)	2-26-04
Pisnoy v. Ahmed, et al.	04-cv-10576 (DPW)	3-24-04

In support of this Motion, Plaintiff Burk submits her accompanying Memorandum of Law, the Declaration of Peter A. Lagorio, Esq., and proposed Pretrial Order No. 1.

DATED: May 11, 2004

By: /s/ Peter A. Lagorio  
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